



April 12, 2022

The Honorable Barbara McLachlan  
House Committee on Education  
200 East Colfax Avenue, Room HCR 0107  
Denver, CO 80203-1784

RE: Oppose the Use of a Collaborative Care Team for Students; HB 22-1260

Dear Chairwoman McLachlan:

On behalf of the American Speech-Language-Hearing Association, I write to oppose HB 22-1260, which requires students with a medical diagnosis to receive accommodations as determined by a collaborative care team rather than the individualized education program team. The legislation also proposes allowing *functional health specialists* and *feeding therapists* to provide and bill for services in schools.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 223,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Speech-language pathologists (SLPs) identify, assess, and treat speech, language, and swallowing disorders. Over 4,200 ASHA members reside in Colorado.<sup>1</sup>

The Individuals with Disabilities Education Act (IDEA), Part B requires that an individualized education program (IEP) be developed for every student who receives special education services.<sup>2</sup> The IEP is a legal and binding document and must be followed as written. By law, IEPs must include:

- present level of academic achievement and functional performance,
- statement of special education and related services as well as supplemental aids and services,
- measurable annual goals,
- how progress will be measured,
- modifications and accommodations that will promote progress toward goals,
- testing accommodations, and
- transition planning to prepare for life after high school graduation.

Adding a collaborative care team is duplicative and unnecessary. The IEP team is already tasked with determining the appropriate supports and services for every child with identified special needs. SLPs are recognized members of the IEP team, along with other recognized treatment partners in schools. SLPs also have the knowledge and skills to deliver swallowing and feeding services. *Functional health specialists* and *feeding therapists* are not recognized by IDEA and are not part of IEP teams.

ASHA maintains that only regulated professionals should be able to provide necessary services. *For example, behavior analysts and behavior technicians* are not licensed in Colorado and, therefore, are not regulated by the Department of Regulatory Agencies. Allowing untrained individuals to deliver these services could cause *significant health and safety risks to students*.

Thank you for considering ASHA's opposition to HB 22-1260. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at [ecrowe@asha.org](mailto:ecrowe@asha.org).

Sincerely,

A handwritten signature in black ink that reads "Judy Rich". The signature is written in a cursive style with a large, prominent initial "J".

Judy Rich, EdD, CCC-SLP, BCS-CL  
2022 ASHA President

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<sup>1</sup> American Speech-Language-Hearing Association. (2021). *Colorado* [Quick Facts]. <https://www.asha.org/siteassets/uploadedfiles/colorado-state-flyer.pdf>.

<sup>2</sup> U.S. Department of Education. (n.d.). *Individuals with Disabilities Education Act (IDEA)*. <https://sites.ed.gov/idea/>.